

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 05CR30039-MAP
	)	
JULIO MARIN	)	
_____	)	

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5

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The United States of America and Julio Marin, through their undersigned attorneys,  
hereby file this joint memorandum.

1. On December 12, 2005, Deputy Superintendent Sheppard of the Franklin County Jail  
informed defense counsel (upon inquiry), as follows:

- a. the computer with DVD player which had been ordered has not arrived. He  
was informed it was on "backorder."
- b. The computer is expected this week.
- c. Julio Marin is not the only inmate waiting to use it to review discovery.

2. Defendant's Motion for Reconsideration on a Motion to Compel Expert Discovery is  
currently pending before the Magistrate Judge. Also pending before the Magistrate Judge is (a)  
Motion for Release and for a Stay and (b) an Ex Parte Motion for Funds.

4. There are no plea negotiations between the parties at the present time.

5. It is defense counsel's position that Julio Marin needs an opportunity to review the

discovery on CD and DVD's and discuss it with counsel and until that happens, defense counsel cannot determine what next steps might be appropriate.

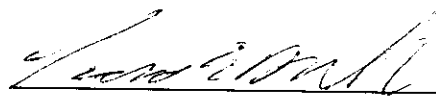
6. Under the circumstances, defense counsel proposes that the court set another interim status conference in approximately six weeks.

7. The parties agree that the period between this date and the date of the next status conference (assuming it is in January, 2006) may be excluded from the speedy trial clock.

Respectfully submitted,

MICHAEL J. SULLIVAN,  
United States Attorney

Date: December 13, 2005



Todd E. Newhouse  
Assistant United States Attorney

JULIO MARIN, By His Attorney



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